Louisiana Department of Environmental Quality
Office of Environmental Services

STATEMENT OF BASIS
For
Activity Number: PER20030002
Permit No. 2211-V3

Clifton Ridge Terminal
Agency Interest No. 1006
CITGO Pipeline Company
Sulphur, Calcasieu Parish, Louisiana

I. APPLICANT

Company

CITGO Pipeline Company
Post Office Box 1424
Lake Charles, Louisiana 70602

Facility

Clifton Ridge Terminal
2451 Clifton Ridge Road, Sulphur, Calcasieu Parish, Louisiana
UTM Coordinates: 4468.30 kilometers East and 3336.30 kilometers North, Zone 15

II. FACILITY AND CURRENT PERMIT STATUS

The Clifton Ridge Terminal is primarily a temporary storage area for crude oil and intermediate petroleum products. Crude oil is received from ships at the larger dock or by pipeline and is stored in floating roof tanks. Intermediate products, including cat feed and light cycle oil, are received via pipeline from the CITGO Lake Charles Refinery and also received and shipped out via the barge and ship docks. These intermediates are stored in fixed roof tanks. Two heaters are used to heat coker feed stored intermittently in the tanks. Crude oil and intermediate products are removed from the facility either by barge at the smaller dock or by pipeline to the refinery. The Clifton Ridge currently operates under Permit 2211-V2, dated June 9, 2003.

III. PROPOSED PERMIT / PROJECT INFORMATION

Proposed Permit

A Part 70 operating permit application and Emission Inventory Questionnaire dated October 10, 2003, were submitted requesting a Part 70 operating permit.

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, and in the local newspaper. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List. The application and proposed permit were submitted to the Calcasieu Parish Library. The proposed permit was submitted to US EPA Region VI. All comments will be considered prior to the final permit decision.

Clifton Ridge Terminal
Agency Interest No. 1006
CITGO Pipeline Company
Sulphur, Calcasieu Parish, Louisiana
Activity Number: PER20030002
Permit No. 2211-V3

Project description

CITGO requested a Part 70 operating permit renewal for the terminal. Tanks T-902 and T-903 will be reconstructed.

Permitted Air Emissions

Permitted emissions from the unit in tons per year are as follows:

Pollutant	Permitted	Proposed	Change
PM_{10}	0.26	0.26	-
SO_2	0.02	0.02	-
NO_X	2.90	2.90	-
CO	2.46	2.46	-
VOC	73.83	76.35	+ 2.52
H_2S	0.52	0.52	-

Prevention of Significant Deterioration (PSD) Applicability

Emissions of the criteria pollutants from the project will not increase more than their PSD significance levels. Therefore, PSD analysis was not required.

Maximum Achievable Control Technology (MACT) requirements

Toxic air Pollutants (TAP) emissions from the storage tanks are controlled as required by 40 CFR 60 Subpart Kb, or 40 CFR 63 Subpart CC, or LAC 33:III.2103. TAP emissions from fugitive components are controlled as required by LAC 33:III.2122. These control techniques are determined as MACT.

Air Modeling Analysis

Emissions from the Terminal are not expected to cause or to contribute to any National Ambient Air Quality Standards (NAAQS) or Ambient Air Standards (AAS) exceedances.

General Condition XVII Activities

(None)

Insignificant Activities (LAC 33:III.501.B.5)

ID	Description	Volume (gallons)	Citation
4-93	Diesel Storage Tank	275	A.3
3-94	Varsol Storage Tank	273	A.3

Clifton Ridge Terminal
Agency Interest No. 1006
CITGO Pipeline Company
Sulphur, Calcasieu Parish, Louisiana
Activity Number: PER20030002
Permit No. 2211-V3

IV. PERMIT SHIELDS

The Permit does not include any Permit Shields

V. PERIODIC MONITORING

The Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are provided in the Facility Specific Requirements Section of the proposed permit.

VI. APLICABILITY AND EXEMPTIONS OF SELECTED SUBJECT ITEMS

ID No:	Requirement	Status	Citation	Explanation
EQT001 EQT002	LAC 33:III.1503 – Emission Standards for Sulfur Dioxide	Exempt	LAC 33:III.1503.C	SO_2 emissions < 250 tons/year
	LAC 33:III.1511 – CEM for SO_2	Exempt	LAC 33:III.1511.A	SO_2 emissions < 100 tons/year
EQT004 EQT005 EQT015	LAC 33:III.2103 – Storage of VOC	Does not apply	LAC 33:III.2103.A	Vapor Pressure < 1.5 psia
	40 CFR 60.110b – NSPS Subpart Kb for storage tanks	Does not apply	40 CFR 60.110b(a)	Vapor Pressure < 0.51 psia
EQT006 EQT007	LAC 33:III.2103 – Storage of VOC	Does not apply	LAC 33:III.2103.A	Vapor Pressure < 1.5 psia
	40 CFR 60.110 – NSPS Subpart K for storage tanks	Does not apply	40 CFR 60.110(c)(2)	Constructed prior to June 11, 1973
EQT008	40 CFR 60.110b – NSPS Subpart Kb for storage tanks	Does not apply	40 CFR 60.110b(a)	Tank volume < 20,000 gallons
EQT009 EQT013	40 CFR 60.110 – NSPS Subpart K for storage tanks	Does not apply	40 CFR 63.640(n)(5)	Subject to 40 CFR 63 Subpart CC
EQT010 EQT012	40 CFR 60.110b – NSPS Subpart Kb for storage tanks	Does not apply	40 CFR 60.110b(a)	Constructed in 1942
EQT014	LAC 33:III.2108 – Marine Vapor Recovery	Does not apply	LAC 33:III.2108.A	Potential VOC emissions < 100 TPY
	40 CFR 63 Subpart Y	Does not apply	40 CFR 63.560(d)(3)	Subject to 40 CFR 63 Subpart CC
The above table provides explanation for both the exemption status or non-applicability of a source cited by 2 or 3 in the matrix presented in Section X of the permit				

Clifton Ridge Terminal
Agency Interest No. 1006
CITGO Pipeline Company
Sulphur, Calcasieu Parish, Louisiana
Activity Number: PER20030002
Permit No. 2211-V3

VII. STREAMLINED REQUIREMENTS

Fugitive emissions from the terminal will be subject to LAC 33:III.2122, 40 CFR 60 Subpart VV, and 40 CFR 63 Subpart CC. CITGO will conduct a leak detection and repair (LDAR) program that meets requirements of LAC 33:III.2122.

Unit or Plant Site	Programs Streamlined	Stream Applicability	Overall Most Stringent Program
Clifton Ridge Terminal	40 CFR 63 Subpart CC	5% VOHAP	LAC 33:III.2122
	LAC 33:III.2122	10% VOC	
	LAC 33:III.5109	TAP	
	40 CFR 60 Subpart VV	10% VOC	

VIII. GLOSSARY

Best Available Control Technologies (BACT) - An emissions limitation (including a visible emission standard) based on the maximum degree of reduction for each pollutant subject to regulation under this part which would be emitted from any proposed major stationary source or major modification which the administrative authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes or available methods, systems, and techniques, including fuel cleaning or treatment or innovative fuel combustion techniques for control of such pollutant.

CAM - Compliance Assurance Monitoring rule – A federal air regulation under 40 CFR Part 64

Carbon Black - A black colloidal substance consisting wholly or principally of amorphous carbon and used to make pigments and ink.

Carbon Monoxide (CO) – (Carbon monoxide) a colorless, odorless gas produced by incomplete combustion of any carbonaceous (gasoline, natural gas, coal, oil, etc.) material.
Cooling Tower – A cooling system used in industry to cool hot water (by partial evaporation) before reusing it as a coolant.

Continuous Emission Monitoring System (CEMS) – The total combined equipment and systems required to continuously determine air contaminants and diluent gas concentrations and/or mass emission rate of a source effluent.

Cyclone – A control device that uses centrifugal force to separate particulate matter from the carrier gas stream.

Duct Burner – A device that combusts fuel and that is placed in the exhaust duct from another source (such as a stationary gas turbine, internal combustion engine, kiln, etc.) to allow the firing of additional fuel to heat the exhaust gases before the exhaust gases enter a steam generating unit.

Federally Enforceable Specific Condition - A federally enforceable specific condition written to limit the potential to Emit (PTE) of a source that is permanent, quantifiable, and practically enforceable. In order to meet these requirements, the draft permit containing the federally enforceable specific condition must be placed on public notice and include the following conditions:

- A clear statement of the operational limitation or condition which limits the source's potential to emit;
- Recordkeeping requirements related to the operational limitation or condition;
- A requirement that these records be made available for inspection by LDEQ personnel;
- A requirement to report for the previous calendar year.

Grandfathered Status- Those facilities that were under actual construction or operation as of June 19, 1969, the signature date of the original Clean Air Act. These facilities are not required to obtain a permit. Facilities that are subject to Part 70 (Title V) requirements lose grandfathered status and must apply for a permit.

Heat Recovery Steam Generator (HRSG) – A steam generator that recovers exhaust heat from a gas turbine, and provides economizing and steam generation surfaces.

Hydrogen Sulfide (H_2S) - A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the action of acids on metallic sulfides, and is an important chemical reagent.

Maximum Achievable Control Technology (MACT) - The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Clifton Ridge Terminal
Agency Interest No. 1006
CITGO Pipeline Company
Sulphur, Calcasieu Parish, Louisiana
Activity Number: PER20030002
Permit No. 2211-V3

NESHAP - National Emission Standards for Hazardous Air Pollutants –Air emission standards for specific types of facilities, as outlined in 40 CFR Parts 61 through 63

Nitrogen Oxides (NO_x) - Compounds whose molecules consists of nitrogen and oxygen.

Nonattainment New Source Review (NNSR) - A New Source Review permitting program for major sources in geographic areas that do not meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. Nonattainment NSR is designed to ensure that emissions associated with new or modified sources will be regulated with the goal of improving ambient air quality.

NSPS - New Source Performance Standards – Air emission standards for specific types of facilities, as outlined in 40 CFR Part 60

Organic Compound - Any compound of carbon and another element. Examples: Methane (CH_4), Ethane (C_2H_6), Carbon Disulfide (CS_2)

Part 70 Operating Permit- Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥10 tons per year of any toxic air pollutant; ≥25 tons of total toxic air pollutants; and ≥100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM_{10}- Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) - The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.